

# EXHIBIT C

**From:** Michael Weinkowitz <MWeinkowitz@lfsblaw.com>  
**Sent:** Wednesday, April 24, 2024 11:35 AM  
**To:** Amy Fiterman - Faegre Drinker Biddle & Reath LLP (amy.fiterman@faegredrinker.com); Laddon, Tarifa B.; Geoffrey Drake (kslaw); andrea.pierson@faegredrinker.com; David Mattern (dmattern@kslaw.com)  
**Cc:** amm@classlawgroup.com; Melissa Yeates (myeates@ktmc.com); SM.MDLAGLeads@coag.gov; MDL3047PSCLEADERSHIP@LISTSERV.MOTLEYRICE.COM; MDL 3047 PSC Leadership Teams ALL; MDL 3047 Co-Lead Firms; TikTok MDL/JCCP Discovery Squad; Jennifer Scullion; Panek, Gabriel A.; Alicia Armstrong; fcraick@kellerrohrback.com  
**Subject:** SM MDL - JCCP - Non-exhaustive list of outstanding TikTok requests etc.

Amy, Tarifa, Geoff and Andrea:

This email serves as a courtesy reminder of the various outstanding issues for which TikTok owes a response or materials. Kindly provide the information, a date for an H2 meet and confer or TikTok's position right away.

- 1 Evidence of any real credible, independent evidence that any TikTok employee on Plaintiffs' List of Early Deponents has been threatened for his or her participation in THIS case, please let us know (ie Police reports etc). Email to Laddon 4/22/24.
- 2 List of alternative School District bellwether selections. See CMO 13.
- 3 The sworn written information and documents for Topics 1 and 2 of the 30(b)(6) Notice. See Drake Email on 4/10/2024 indicating that information would be forthcoming on 4/15/2024.
- 4 A list of third parties with whom TikTok has consulted on topics that may be relevant to the issues in this litigation with detail. See Email to/from Fiterman 4/21/2024.
- 5 A written explanation of why some produced documents list "TikTok" as a custodian. See numerous emails to Fitterman.
- 6 TikTok's final position regarding RFP 164-166; 168-170; 153, and a date for a Section H(2) meet and confer. See numerous emails and letters.
- 7 TikTok's final position and H(2) conference date re Zoom Archive. See 4/23/24 Email to Fiterman.
- 8 A date time for an Section H(2) conference regarding TikTok's refusal to grant Plaintiffs' request for consent to ask the States Attorney General to share with the PI / SD Plaintiffs copies of TikTok's responses to interrogatories and demand for statements under oath served as part of the States Attorney General's pre-complaint investigation, including lists of custodians. See Email to Fitterman 4/22/2024.
- 9 The Solo deposition transcript. See Email to Fitterman dated 4/23/24.
- 10 A date time for an H2 conference Topic 21-23. See Email to Mattern 4/22/24.
- 11 Date and time for an H2 conference for RFPs and FRCP 34 (RFP Set 3: Nos. 133, 134, 135, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147. RFP Set 4: Nos. 150, 153, 155, 156, 157, 158, 159, 160, 162, 163, 164, 165, 167, 169, 170. RFP Set 5: Nos. 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 185, 186, 187, 190, 196, 197. RFP Set 6: Nos. 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212; RFP Set 7: Nos. 213, 214, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229. RFP Set 8: Nos. 230, 233. RFP Set 9: Nos. 234, 235, 236, 237, 238. Email to Fitterman 4/22/24).
- 12 Response and H2 Conference for issues raised in Letter to Fitterman 4/12/2024.

Thanks<sup>②</sup>

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